

IN THE UNITED STATES DISTRICT COURT FOR THE  
NORTHERN DISTRICT OF OKLAHOMA

W. A. DREW EDMONDSON, in his )  
capacity as ATTORNEY GENERAL )  
OF THE STATE OF OKLAHOMA and )  
OKLAHOMA SECRETARY OF THE )  
ENVIRONMENT C. MILES TOLBERT, )  
in his capacity as the )  
TRUSTEE FOR NATURAL RESOURCES )  
FOR THE STATE OF OKLAHOMA, )  
Plaintiff, )  
vs. ) 4:05-CV-00329-TCK-SAJ  
TYSON FOODS, INC., et al, )  
Defendants. )

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THE VIDEOTAPED DEPOSITION OF  
ARCHIE SCHAFFER, produced as a witness on behalf  
of the Plaintiff in the above styled and numbered  
cause, taken on the 9th day of July, 2008, in the  
City of Fayetteville, County of Washington, State of  
Arkansas, before me, Lisa A. Steinmeyer, a Certified  
Shorthand Reporter, duly certified under and by  
virtue of the laws of the State of Oklahoma.

Exhibit 32

TULSA FREELANCE REPORTERS  
918-587-2878

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1 Q All of your -- the Tyson poultry are now grown  
2 by what are known as contract growers within that  
3 watershed?

4 A That's my understanding, although I'm, you  
5 know, not directly involved in that, so -- but I  
6 believe that to be the case.

09:26AM

7 Q And throughout the growing process, Tyson  
8 continues to maintain ownership of the poultry?

9 A Yes.

10 Q They provide all of the feed?

09:27AM

11 A Yes.

12 Q And they own the feed?

13 A Yes.

14 Q And do you know when one of the birds die that  
15 Tyson owns, whether Tyson continues to own that bird  
16 or does the ownership of the carcass pass to the  
17 grower?

09:27AM

18 MR. GEORGE: Object to the form, calls for  
19 a legal conclusion. Answer, if you can.

20 A I don't know the answer to exactly who owns  
21 the carcass. I do know that it's the responsibility  
22 by contract of the grower to be -- you know, to be  
23 responsible for the carcass, but I'm not sure who  
24 owns it actually.

09:27AM

25 Q Now, and the same is true of the manure that

09:28AM

TULSA FREELANCE REPORTERS  
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